

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

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Pablo Orellana,

Plaintiff(s),

-against-

New Food Corp., et al.

Defendant(s).

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**[PROPOSED] INITIAL CASE  
MANAGEMENT  
STIPULATION AND  
SCHEDULING ORDER  
18-CV-7466 (JMA) (AKT)**

**A. KATHLEEN TOMLINSON, Magistrate Judge:**

**I. DEADLINES AND COURT APPEARANCES**

Deadline for completion of initial disclosures required by Rule 26(a):	July 10, 2020
First request for production of documents and first request for interrogatories due by:	August 10, 2020
Responses to first request for production of documents and first set of interrogatories due by:	September 23, 2020
Deadline for joinder of additional parties and amendment of pleadings:	October 5, 2020
Status Conference:	_____

**II. CHECKLIST TO BE COMPLETED BY THE PARTIES AND RETURNED WITH THE RULE 26(f) DISCOVERY PLAN:**

- A. Initial Disclosures: Counsel confirm that the Initial Disclosures HAVE NOT been served.
- B. Stipulation and Order of Confidentiality: Counsel confirm that they have consulted in good faith regarding the need for such an order.

Based on that consultation, counsel find that a Stipulation and Order of Confidentiality is NEEDED

- C. Electronically Stored Information ("ESI"): Counsel confirm that they have met and conferred regarding the existence of any relevant ESI on both sides.

The parties have had some preliminary discussion about the type of ESI which is in their clients' respective possession or control and how they wish to have such ESI produced.

Based on those discussions, counsel are advising the Court that the relevant ESI may consist of

1. Any available surveillance footage showing the incident for which the Plaintiff was allegedly terminated;
2. Available electronic wage and hour records for the Plaintiff for the six year period immediately preceding the filing of the complaint;
3. Text messages and emails of Plaintiff regarding the allegations in the complaint
4. Text messages and emails of Defendants regarding the allegations in the complaint.

- D. HIPAA Release Authorizations: Counsel confirm that such authorizations for this case are NOT NEEDED.

Dated: Central Islip, New York  
June 30, 2020

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**SO ORDERED:**

KATHLEEN TOMLINSON  
United States Magistrate Judge